

**REMARKS**

The Examiner is thanked for the thorough review and consideration of the present application. The non-final Office Action dated June 10, 2004 has been received and its contents carefully reviewed.

By this Response, claims 1, 10, 19 and 22 have been amended, and claims 3 and 21 have been cancelled without prejudice or disclaimer of the subject matter recited therein. No new matter has been added. Reconsideration and withdrawal of the rejections in view of the above amendments and the following remarks are respectfully requested.

In the Office Action, claims 2, 4-6, 12-15 and 21-23 are objected to as being dependent upon a rejected base claim, but would allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims. Applicants have cancelled claim 21 and incorporated the allowable subject matter into independent claim 19. Accordingly, the objection to claim 21 is overcome. Applicants kindly acknowledge the allowable subject matter of claims 2, 4-6, 12-15 and 22-23, but elect not to rewrite these claims in independent form at this time to permit the Examiner an opportunity to reconsider the rejection of the claims in view of the following remarks. Withdrawal of the objection is requested.

In the Office Action, claims 1, 3, 7-11 and 16-18 are rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Publication No. 2001/0013915, issued to Song. Claim 3 has been cancelled without prejudice or disclaimer. Applicants respectfully traverse the rejection because Song fails to teach each of the features recited in the claims of the present application. Specifically, Song fails to teach or suggest an in-plane switching liquid crystal display device including “a first conductive line formed directly on the first substrate... an auxiliary pattern perpendicularly extended from the first conductive line” as recited in independent claim 1 of the present application. Because Song does not teach at least these features of independent claim 1, claim 1 and its dependent claims 7-9 are allowable over Song.

Claim 10 is allowable over Song because Song fails to teach or suggest an in-plane switching liquid crystal display device including “a first conductive line formed directly on the first substrate... an auxiliary pattern perpendicularly extended from the first conductive line” as

recited in independent claim 10. Because Song fails to teach at least these features of independent claim 10, claim 10 and its dependent claims 11 and 16-18 are allowable over Song.

Reconsideration and withdrawal of the rejection of claims 1, 3, 7-11 and 16-18 are respectfully requested.

In the Office Action, claims 19, 20 and 24-27 are rejected under 35 U.S. C. § 103(a) as being unpatentable over U.S. Patent No. 6,469,764, issued to Kim et al. (hereafter "Kim") in view of U.S. Patent No. 6,281,958, issued to Nakajima et al. (hereafter "Nakajima"). Applicants traverse the rejection because neither Kim nor Nakajima, analyzed alone or in any combination, teaches or suggests the combined features recited in the claims of the present application. For example, Kim and Nakajima fail to teach or suggest a method for fabricating an in-plane switching liquid crystal display device that includes, among other features, "forming a first conductive line directly on the first substrate; forming a common line on the first substrate... forming a first pixel electrode connecting line on the first substrate; forming an auxiliary pattern perpendicularly extended from the first conductive line" as recited in independent claim 19.

The Office Action alleges that Kim discloses all the features of claim 19 except "the required common line." To compensate for the deficient teachings of Kim, the Office Action relies upon the teachings of Nakajima. Based upon the teachings of Nakajima, the Office Action states that it would have been obvious to one of ordinary skill in the art at the time the invention was made to include the common line in Kim as taught by Nakajima to obtain the features recited in the claims of the present application. Applicants respectfully disagree.

Applicants submit, like Kim, Nakajima fails to teach or suggest "forming a first conductive line directly on the first substrate; forming a common line on the first substrate;...forming a first pixel electrode connecting line on the first substrate; forming an auxiliary pattern perpendicularly extended from the first conductive line" as recited in independent claim 19. Because Nakajima fails to teach or suggest at least these features, Nakajima fails to remedy the deficient teachings of Kim such that one of ordinary skill in the art would be motivated by the teachings of Nakajima to modify Kim to obtain a method for fabricating an in-plane switching liquid crystal display device having the combined features recited in independent claim 19. Accordingly, independent claim 19 and its dependent claims 20

Application No.: 10/020,894  
Amendment dated September 3, 2004  
Reply to Office Action dated June 10, 2004

Docket No.: 8733.556.00-US

and 24-27 are allowable over Kim and Nakajima. Reconsideration and withdrawal of the rejection are requested.

In view of the above, each of the presently pending claims in this application is believed to be in immediate condition for allowance. Accordingly, the Examiner is respectfully requested to pass this application to issue. If the Examiner deems that a telephone conversation would further the prosecution of this application, the Examiner is invited to call the undersigned at (202) 496-7500.

If these papers are not considered timely filed by the Patent and Trademark Office, then a petition is hereby made under 37 C.F.R. §1.136, and any additional fees required under 37 C.F.R. §1.136 for any necessary extension of time, or any other fees required to complete the filing of this response, may be charged to Deposit Account No. 50-0911. Please credit any overpayment to deposit Account No. 50-0911. A duplicate copy of this sheet is enclosed.

Dated: September 3, 2004

Respectfully submitted,

By Valerie Hayes  
Valerie Hayes

Registration No.: 53,005  
MCKENNA LONG & ALDRIDGE LLP  
1900 K Street, N.W.  
Washington, DC 20006  
(202) 496-7500  
Attorney for Applicant